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PLEASE RESPOND TO ALBANY OFFICE

August 4, 2008

Via Electronic Filing

Hon. Frederick Block
U.S. District Court, Eastern District
225 Cadman Plaza East
Brooklyn, New York 11201

Re: Pensionsversicherungsanstalt v. Philip L. Greenblatt, et al.
Our File No.: 6029.001

Dear Judge Block:

I represent defendant Philip Greenblatt in the above-captioned matter. I am writing in support of the letter of Lewis R. Silverman, Esq. (Counsel for Defendant Sonja Rosenbaum) and in opposition to plaintiff's recent letter seeking to engage in discovery. Please note that we only recently appeared on behalf of defendant Greenblatt with the filing of our answer on July 9, 2008. A discovery schedule had been entered prior to our appearance on behalf of Mr. Greenblatt. The parties were in the process of trying to arrange for mediation with plaintiff's counsel also trying to serve the one remaining defendant (Robinson) who had not even been served (and we are advised that defendant Robinson has now been served).

We agree that discovery should be stayed while defendant Rosenbaum's FRCP 12(c) motion to dismiss is decided. I thank you for your time and consideration of this matter.

Respectfully submitted,

BURKE, SCOLAMIERO, MORTATI & HURD, LLP

By 
THOMAS J. MORTATI
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TJM

Hon. Frederick Block

August 4, 2008

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cc: Lewis R. Silverman, Esq.
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